## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA CRIMINAL NO: 22-CR-223 (NEB/DTS)

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United	States	$\cap$ t A	America,
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Plaintiff,

VS.

Aimee Marie Bock (1),

Defendant.

DEFENDANT AIMEE BOCK'S MOTION IN LIMINE NO. 7

## **INTRODUCTION**

Defendant Aimee Marie Bock (hereinafter "Defendant"), through her counsel, Kenneth Udoibok, respectfully moves this Court to preclude the Government from introducing certain evidence and making certain arguments. Bock reserves the right to file additional motions in limini once she has reviewed the Government's recently produced witnesses and exhibits list.

## MOTION IN LIMINE NO. 7 (undisclosed expert testimony)

The Government should be precluded from offering any undisclosed expert opinions. For example, the Government did not disclose any experts or analysis about: (i) how much profit vendors and distributors could reasonably anticipate making on the food program; (ii) how much vendors and distributors can reasonably expect to pay for the food that qualifies for reimbursable meals under the food program; (iii) how much vendors and distributors can reasonably expect to incur in overhead costs to participate in

the food program; (iv) how many meals a site could reasonably expect to serve in a given day; (v) how many children a site could reasonably expect to serve; (vi) the legal responsibilities and obligations of sponsors; or (vii) the adequacy of Feeding Our Future's policies and procedures. Those are matters of expert opinion and beyond the common experience of lay people and require disclosure before they can be admitted at trial. The Government should be precluded from offering any opinion testimony not timely disclosed.

Respectfully Submitted

KENNETH UBONG UDOIBOK, P.A.

January 13, 2025

/s/Kenneth U. Udoibok
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